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Attorney for
4th Street South II, LLC, a Michigan limited liability company

**UNITED STATE BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

CHAPTER 11

SEARS HOLDINGS CORPORATION, *et al.*

CASE NO. 18-23538 (RDD)

Debtor,

Jointly Administered

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for 4th Street South II, LLC, a Michigan limited liability company, a creditor and party-in-interest (landlord of certain property located at 3131 E Michigan Ave., Lansing, Michigan pursuant to a lease with Sears, Roebuck and Co.) in the above-captioned bankruptcy case, which requests that all notices given or required to be given, and all papers served or required to be served, in this case pursuant to, among other things, the United States Bankruptcy Code and Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), be emailed to and served on:

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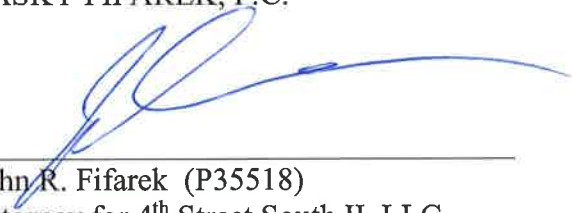
PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and papers referred to in the Bankruptcy Rules, including, without limitation, those Rules specified above, but also includes, without limitation, any orders and notices of any application, plan and objections thereto, notices of any orders, pleadings, motions, petitions, pleadings, applications, complaints, demands, hearings, answers, responses, memoranda and/or briefs in support of the foregoing, any other documents brought before the Court with respect to those pleadings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, and delivery, telephone, telegraph, telex, facsimile, e-mail or otherwise, which: (1) affects or seeks to affect in any way any rights or interests of any creditor or party-in-interest in this case, including, without limitation, 4th Street South II, LLC, a Michigan limited liability company, with respect to (a) the debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor and/or 4th Street South II, LLC, a Michigan limited liability company may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct of 4th Street South II, LLC, a Michigan limited liability company.

PLEASE TAKE FURTHER NOTICE that 4th Street South II, LLC, a Michigan limited liability company intends that this Notice of Appearance, and any later appearance, pleading, claim or suit, shall not waive: (1) the right of 4th Street South II, LLC, a Michigan limited liability company, to have final orders in non-core matters entered only after *de novo* review by a District Judge; (2) the right of 4th Street South II, LLC, a Michigan limited liability company, to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (3) the right of 4th Street South II, LLC, a Michigan limited liability company, to have the District Court withdraw the reference in any matter subject to mandatory or discretionary

withdrawal; and/or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which 4th Street South II, LLC, a Michigan limited liability company, is or may be entitled under any agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs, and recoupments 4th Street South II, LLC, a Michigan limited liability company, expressly hereby reserves and preserves in this case.

Respectfully submitted,

LASKY FIFAREK, P.C.



Dated: November 14, 2018.

John R. Fifarek (P35518)
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a Michigan limited liability company
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